

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No: 04-40190-FDS

COLLEEN O'DONNELL, )  
Plaintiff, )  
 )  
v. )  
 )  
ALBERTO R. GONZALES, ATTORNEY )  
GENERAL, U.S. DEPARTMENT )  
OF JUSTICE, )  
Defendants, )

**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND TIME TO  
DESIGNATE AND SUBMIT EXPERT INFORMATION**

Now comes the Plaintiff in the above-entitled matter and respectfully requests this Honorable Court to allow the Plaintiff's Assented to Motion to Extend Time to Designate and Submit Expert Information.

As grounds therefor, the Plaintiff states that:

1. The current discovery deadline is September 1, 2005;
2. Currently, the depositions of the parties are scheduled for August 24, 2005, and August 26, 2005, following which the majority of the discovery in this matter will be completed;
3. The deadline for the Plaintiff's designation and submittance of expert information is currently September 1, 2005;
4. The parties have agreed that following the completion of discovery, they would attempt to explore the possibility of settlement;
5. Plaintiff's counsel is currently scheduled to be out of the country, on vacation, from September 24, 2005, through October 10, 2005;
6. In order for the parties to have time to explore the possibility of settlement, and in order to save the cost and expense of designating experts at this point in time, the parties

hereby request an additional sixty (60) days from the current deadline to submit expert information.

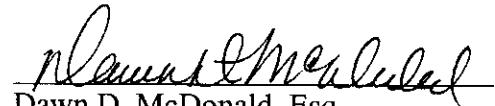
7. Additionally, the parties request that should the Court grant this motion, that the Status Conference currently scheduled for September 22, 2005, at 3:00 p.m., be rescheduled to a date following the new deadline that is convenient to the Court.
8. Plaintiff's counsel has conferred with Defense counsel and the Defendants have assented to this motion.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court allow her Assented to Motion to Extend Time to Designate and Submit Expert Information.

The Plaintiff  
Colleen O'Donnell

By her Attorney:

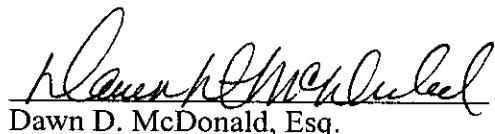
82460

  
Dawn D. McDonald, Esq.  
BBO# 647256  
Cooley, Shrair P.C.  
1380 Main Street  
Springfield, MA 01103  
413-781-0750 (p)  
413-733-3042 (f)

**CERTIFICATE OF SERVICE**

I, Dawn D. McDonald, hereby certify that I caused the foregoing to be served upon the Defendants by mailing a copy thereof on this 19th day of August, 2005, via first class mail, as follows:

Damian Wilmot, Assistant U.S. Attorney  
John Joseph Moakley United States Courthouse  
One Courthouse Way, Suite 9200  
Boston, MA 02210

  
Dawn D. McDonald, Esq.